

Via Electronic Filing

October 2, 2017

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth St., SW
Washington, DC 20554

Re: Notice of Ex Parte Presentation – MB Docket No. 12-108

Dear Ms. Dortch:

This is to notify you that on September 28, 2017, Julie Kearney, Vice President, Regulatory Affairs, Consumer Technology Association (“CTA”) and Rachel Sanford Nemeth, Director, Regulatory Affairs, CTA, together with CTA outside counsel William Maher and Rachel Wolkowitz of Wilkinson Barker Knauer, LLP, met with Maria Mullarkey of the Media Bureau, and Karen Peltz Strauss, Suzy Rosen Singleton, Eliot Greenwald, and Will Schell of the Consumer and Governmental Affairs Bureau.

During the meeting, Commission staff and CTA representatives discussed potential avenues to address the challenges of educating consumer technology companies that are not “traditionally” regulated by the FCC regarding the FCC’s rules, including the FCC’s accessibility rules. CTA representatives discussed the existing educational materials CTA has made available to members and described plans for potential outreach to CTA’s members as well as other trade associations whose members may have become subject to the FCC’s accessibility rules because, for example, they are building new video and communications functionality into their consumer technology.

Consistent with CTA’s view that the rules should allow for a transition time in proportion with consumer technology product development cycles, CTA also takes this opportunity to express its support of the recent narrow waivers that the Media Bureau granted to certain automakers with respect to rear entertainment systems to address very specific implementation issues.¹ Automaker product development cycles are much

¹ *Accessibility of User Interfaces, and Video Programming Guides and Menus*, Memorandum Opinion and Order, 32 FCC Rcd 1926 (MB 2017) (granting Honda’s request for a waiver of the accessible user interfaces requirements for rear entertainment systems (“RES”) on a narrow class of Honda vehicles); *Accessibility of User Interfaces, and Video Programming Guides and Menus*, Memorandum Opinion and Order, DA 17-929 (Sept 25, 2017) (granting Fiat Chrysler

longer than the traditionally regulated consumer technology products like TVs and handsets,² and CTA supports further appropriate flexibility in particularized situations, as automakers and their suppliers address in good faith the FCC's accessibility rules.

Pursuant to Section 1.1206 of the Commission's rules,³ this letter is being electronically filed with your office and a copy of this submission is being provided to meeting attendees from the Commission. Please let the undersigned know if you have any questions regarding this filing.

Respectfully submitted,

/s/ Julie M. Kearney

Julie M. Kearney
Vice President, Regulatory Affairs

cc: Maria Mullarkey
Karen Peltz Strauss
Suzy Rosen Singleton
Eliot Greenwald
Will Schell

Automobiles US LLC's request for a waiver of the accessible user interfaces requirements for RES on a narrow class of Fiat Chrysler vehicles).

² See, e.g., Reply Comments of the Consumer Electronics Association, MB Docket No. 12-108, at 17 (filed Aug. 7, 2013) (urging the FCC to adopt a rules phase-in period that reflected the product development cycle, in that case, the product cycle especially for televisions).

³ 47 C.F.R. § 1.1206.